

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

Gail Hannigan,

Plaintiff

v.

The Monarch School of New England,

Defendant.

Civil Action No.

NOTICE OF REMOVAL
AND DEMAND FOR JURY TRIAL

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. §§1441 and 1446, Defendant THE MONARCH SCHOOL OF NEW ENGLAND (“Monarch School”), by and through its attorneys, JACKSON LEWIS P.C., hereby removes this action from the Superior Court of the State of New Hampshire, Strafford County, to the United States District Court for the District of New Hampshire. In support of this Notice of Removal, Monarch School states as follows:

1. By Complaint and Demand for Jury Trial filed on or about April 23, 2019 in the Strafford County Superior Court, Plaintiff Gail Hannigan instituted a claim against Defendant. A copy of Plaintiff’s Complaint and Demand for Jury Trial is attached hereto as Exhibit 1, a certified copy of which is to be forwarded upon receipt of the state court record from the Strafford County Superior Court.

2. This Court has original jurisdiction over this action by virtue of federal question jurisdiction pursuant to 28 U.S.C. §1331. Specifically, Plaintiff is alleging violations of 42 U.S.C. §12101 *et seq.* (“ADA”), 29 U.S.C. §2601 *et seq.* (“FMLA”), as well as various other claims including retaliation and other statutory violations pursuant to state law.

3. Pursuant to 28 U.S.C. §1446(a), this notice of removal is timely filed within thirty (30) days of April 29, 2019, the date on which counsel for Monarch School first received a copy of the state court Complaint and Demand for Jury Trial.

4. As this action could have been commenced in this Court, removal is proper. 28 U.S.C. §1441(a). Furthermore, this Court may exercise supplemental jurisdiction over the Plaintiff's state law claims. See 28 U.S.C. §1367(a).

Respectfully Submitted,
THE MONARCH SCHOOL OF NEW ENGLAND
By its attorneys,
JACKSON LEWIS P.C.,

Date: May 28, 2019

By: /s/K. Joshua Scott
K. Joshua Scott, NHBA#17479
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Certificate of Service

I hereby certify that the foregoing was served via ECF on all parties of record.

Date: May 28, 2019

By: /s/K. Joshua Scott
K. Joshua Scott, NHBA#17479